

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: BAY STATE GAS COMPANY  
STAFFING AND OTHER MATTERS**

**DTE 06-31**

**FIRST SET OF INFORMATION REQUESTS OF INTERVENOR UNITED STEEL,  
PAPER AND FORESTRY, RUBBER, MANUFACTURING, ENERGY, ALLIED  
INDUSTRIAL AND SERVICE WORKERS INTERNATIONAL UNION ("USW"),  
AFL-CIO<sup>1</sup>**

USW 1-1: From June 1, 2005 to date, identify every affiliate of NiSource that has outsourced call center, credit, collections, billing, or any other functions under the June 2005 Agreement between NiSource Corporate Services Company ("NCSC") and IBM. Additionally, for each outsourced function at each affiliate, provide the date that outsourcing was actually implemented.

USW 1-2: For each of the affiliates identified in response to USW 1-1, provide all documents within the possession, custody, or control of NiSource or its affiliates regarding or related to the quality of services provided by IBM (and/or associated vendors) in performing "customer facing" functions since July 1, 2005. This request includes, but is not limited to, internal memoranda, e-mails, and reports addressing the performance of IBM and/or second-tier vendors associated with IBM—*e.g.*, Vertek, to date and any customer complaints regarding customer service.

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1 In this request, the term "document" or "documents" means the originals and all non-identical copies (whether different from originals by reason of notations made on such copies or otherwise), or in lieu thereof, true and exact copies, regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched or graphic matter of any kind, type or nature whatsoever, however produced or reproduced, including but not limited to contracts, proposals, statements and invoices, financial books and records, letters or other correspondence, e-mails, telegrams, telex messages, memoranda and notes of telephone conversations, telephone logs, memoranda and notes of meetings and interviews, inter-office communications, instructions, notes, memoranda, reports, summaries, manuals, magnetic tapes, tabulations, records, work papers, research papers, books, journals, microfiche, microfilm, photographic film, surveys, charts, studies, data sheets, desk calendars and diaries, policies, printed matter, telephone logs, work sheets and working papers and all documentary materials of any nature whatsoever.

The term "identify" means, with respect to a natural person, (1) his or her name; (2) his or her current job title, if still employed by the Company, and whether he or she is employed directly by Bay State Gas or NiSource; (4) his or her current business address and telephone number; and, (5) the name and address of his or her current employer, if not currently employed by the Company.

The term "identify" means, with respect to documents, (1) the author thereof and the person or persons to whom the document(s) was originally directed; (2) the source from whom Complainant obtained such document(s); (3) the date of each such document(s); (4) the current custodian of each such document(s); (5) the location at which each such document(s) is situated; and, (6) the subject matter of each such document(s).

- USW 1-3: To the extent not provided in response to USW 1-2, from July 1, 2005 to date, for each NiSource affiliate, provide all employee complaints and/or Union grievances relating to or regarding the outsourcing of employee payroll services.
- USW 1-4: From December 1, 1999 to date, identify every NiSource affiliate within which “customer facing” functions and/or human resources functions have been outsourced to an external vendor other than IBM and its second-tier vendors. Additionally, identify the vendor, the functions outsourced to the vendor, the length of the outsourcing agreement between NiSource (, NCSC, or the affiliate) and the vendor.
- USW 1-5: Identify every BSG and/or NiSource employee responsible for the decision to freeze hiring at BSG in December 2001. Provide each individual’s job title when the decision was made, his current position, his employer, and whether each employee received his salary from Bay State, NiSource, or another NiSource affiliate in 2001.
- USW 1-6: Provide all documents regarding, relating to, or informing the decision-makers identified in your response to USW 1-5 to institute a hiring freeze at BSG in 2001.
- USW 1-7: State the grounds for the decision to institute a hiring freeze at Bay State Gas in 2001.
- USW 1-8: Provide the date that the hiring freeze, initiated in 2001, was officially lifted at BSG.
- USW 1-9: Identify every Bay State Gas and NiSource employee responsible for the decision to lift the hiring freeze at Bay State Gas on the date identified in your response to USW 1-8. Provide each individual’s job title at that time, his employer, and as whether the employee received his salary from Bay State, NiSource, or another NiSource affiliate in 2001.
- USW 1-10: Provide all documents regarding, relating to, or informing decision to lift the hiring freeze at BSG on the date specified in your response to USW 1-8.
- USW 1-11: For January 1, 2003 to date, identify every BSG and NiSource employee or agent with authority to determine when BSG should pursue a consumer rate increase with the Department of Telecommunications and Energy, e.g., DTE -5-27.
- USW 1-12: Provide the date the individuals identified in your response to USW 1-11, decided to pursue the rate increase which gave rise to DTE 05-27.

- USW 1-13: For each of the following individuals listed in BSG President Bryant's direct testimony (DTE 06-31), provide his or her current official title at NiSource and explain the role and authority each has in making decisions regarding BSG staffing levels for each of its departments and the outsourcing of customer facing functions at BSG.
1. Bob Skaggs
  2. Mike O'Donnell
  3. Kathleen O'Leary
  4. Harris Marple
  5. Dave Vajda
  6. Jeff Grossman
  7. Gary Pottorff
- USW 1-14: From January 1, 2003 to date, provide all NiSource, NCSC, and/or BSG requests for proposals to outsource work performed by BSG and other NiSource affiliate employees.
- USW 1-15: Provide the date that IBM Global Solutions ("IBM") was selected as a vendor, culminating in the June 2005 agreement between NCSC and IBM.
- USW 1-16: Identify all BSG, NCSC, and/or NiSource employees tasked with evaluating the June 2005 Agreement between IBM and NiSource before and after June 21, 2005 to determine whether BSG should utilize IBM and its second-tier vendor, Vertek, for customer service, billing, sales, and other functions. Provide each individual's job title, his employer, and whether he received his salary from BSG, NiSource, another NiSource affiliate, or another source.
- USW 1-17: Identify all BSG and NiSource employees with decision-making authority over whether BSG should utilize IBM and its second-tier vendors for customer service, billing, sales, and other customer facing functions under the June 2005 IBM-NCSC Agreement. Provide each individual's job title, his employer, and whether each employee received his salary from BSG, NiSource, another NiSource affiliate, or another source.
- USW 1-18: From January 1, 2005 to date, provide all documents within the possession, custody or control of NiSource, NCSC, and/or BSG consulted in or informing the decision to outsource BSG's "customer facing", human resources, and information technology functions under the June 2005 IBM-NiSource Agreement.
- USW 1-19: To the extent not provided as part of your response to USW 1-18, provide all documents within the control of NiSource, NCSC, and/or BSG relating to or regarding IBM's performance administering call centers under agreements with other companies.

- USW 1-20: From July 1, 2005 to date, provide all documents, including, but not limited to internal memoranda, reports, and analyses, relating to or regarding IBM's performance of information technology services for BSG under the June 2005 NCSC-IBM Agreement.
- USW 1-21: From July 1, 2005 to date, identify each NiSource affiliate whose call center functions have been consolidated into the Smithfield, Pennsylvania call center owned by Columbia Gas and administered by IBM and its second tier vendor, Vertek.
- USW 1-22: From July 1, 2005 to date, provide all documents within the custody, possession, or control of BSG, NCSC, or NiSource relating to or regarding the training of Smithfield, Pennsylvania Call Center facility workers responding to billing, service, and credit calls for NiSource affiliates.
- USW 1-23: From July 1, 2005 to date, provide all documents within the custody, control, or possession of NiSource, NSCS or BSG regarding or relating to the Smithfield Call Center's customer service performance for Columbia Gas and every other NiSource affiliate utilizing the Smithfield Call Center. This request includes, but is not limited to, any documents concerning IBM's ability to meet customer service quality indicators on behalf of each NiSource affiliate it serves at the Smithfield, PA Call Center.
- USW 1-24: Prior to July 1, 2005, how many individuals were employed by Columbia Gas to staff its call center(s)? How many individuals does IBM currently use to staff customer service for Columbia Gas customers?
- USW 1-25: To date, provide all documents regarding or relating to the means BSG, NiSource, and/or NCSC use to monitor functions outsourced to IBM and/or its second tier vendors to ensure that IBM maintains and/or improves upon service quality standards under the IBM-NiSource Agreement.
- USW 1-26: Provide all training materials currently utilized by BSG to train Springfield Call Center universal service representatives to perform service, billing, and credit calls for BSG customers.
- USW 1-27: Identify all NiSource and/or NCSC employees charged with addressing deficiencies in service quality (in the performance of service, credit, billing, and collections functions, payroll functions, and information technology functions) with IBM and/or its second tier vendors pursuant to the June 2005 IBM-NiSource Agreement. Provide each individual's job title, as well as whether each employee received his salary from NiSource or another NiSource affiliate.
- USW 1-28: Identify all BSG employees charged with addressing deficiencies in service

quality (in the performance of information technology and payroll functions) with IBM and/or its second-tier vendors pursuant to the June 2005 IBM-NiSource Agreement. Provide each individual's job title.

- USW 1-29: From December 1999 to date, provide all documents in the possession, custody or control of BSG, NCSC, or NiSource, including but not limited to, internal memoranda, reports, e-mails, meeting notes, regarding or relating to Springfield Call Center's failure to meet Massachusetts, New Hampshire, or Maine customer service quality indicators (from time to time between 1999 and the present date). This request includes, but is not limited to, documents regarding or relating to strategies set forth by BSG, its agents, or employees to improve service quality and/or to increase staffing levels.
- USW 1-30: From June 1, 2005 to date, provide the total number of hours and the cost of overtime performed at the Springfield Call Center, aggregated by month. For the same time period, provide all documents consulted, informing, relating to or regarding the use of overtime to fill positions at the Springfield Call Center.
- USW 1-31: For duration of the June 2005 NCSC-IBM Agreement, provide the projected per annum cost savings that BSG/NiSource is projected to reap as a result of adopting the IBM-NiSource Agreement and outsourcing the Springfield Call Center.
- USW 1-32: For each year beginning January 1, 1999 to the present date, provide the number of trunk lines that BSG utilized to take customer service, billing, and credit calls at its Springfield Call Center.
- USW 1-33: From December 1999 to date, provide all documents in the possession, custody, or control of NiSource, NCSC, or BSG regarding or relating to whether the number of trunk lines utilized by BSG's Springfield Call Center should be, or were, lowered, or conversely, increased.
- USW 1-34: To the extent not provided in any of your previous responses, identify all NiSource employee(s) or agent(s) who are currently responsible for call center operations, staffing levels at NiSource affiliates' call centers, and/or administering the June 2005 NCSC-IBM Agreement with regard to customer service, billing, credit and collections, information technology, and human resources functions.

Respectfully submitted,

UNITED STEEL, PAPER AND FORESTRY,  
RUBBER, MANUFACTURING, ENERGY,  
ALLIED INDUSTRIAL AND SERVICE  
WORKERS INTERNATIONAL UNION, AFL-  
CIO

By its attorneys,

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